



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

JANE M. AZIA
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CONSUMER FRAUDS & PROTECTION BUREAU

April 29, 2025

By ECF

The Honorable John G. Koeltl
United State District Judge, Southern District of New York
Daniel Patrick Moynihan United State Courthouse
500 Pearl St., Courtroom 14A
New York, NY 10007

DailyPay, LLC v. Attorney General Letitia James, No. 25 Civ. 2849 (S.D.N.Y.)
People of the State of New York v. DailyPay, Inc., No. 25 Civ. 3439 (S.D.N.Y.)

Dear Judge Koeltl:

We write jointly on behalf of all parties in the above-captioned actions, which have been related by the Court, and under Paragraph I.C of Your Honor's Individual Practices to respectfully request an adjournment of the time to move, answer, or otherwise respond to the Complaint or Petition in each of the above-captioned actions. The New York State Office of the Attorney General ("OAG") intends to move to remand the action captioned *People of the State of New York v. DailyPay, Inc.* Because of the overlap of substantive issues involved in the two above-captioned actions, the parties request that the responsive pleading deadline in both actions follow the same schedule and be adjourned until after the Court has ruled on the OAG's forthcoming motion for remand. Such an adjournment would promote efficiency and conserve judicial resources and the resources of the parties. The original deadline for the OAG to move, answer, or otherwise respond to the Complaint in *DailyPay, LLC v. James* is May 1, 2025. The original deadline for DailyPay, Inc. to move, answer, or otherwise respond to the Petition in *People of the State of New York v. DailyPay, Inc.* is May 6, 2025. This is the parties' first request for an adjournment.

Filed in
25 CV 2849
and 25 CV 3439
Time to respond in both actions
is stayed until fourteen days after
a decision on the motion to remand
in 25 CV 3439.
4/30/25
GO ORDERED
J. Koeltl
U.S.D.J.

Respectfully submitted,

By: /s/ Marcus A. Asner

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By: /s/ Christopher L. Filburn

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General Letitia James and
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